

## UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

Kayla Massa

) )  
Case No.

ORIGINAL FILED

FEB 07 2020

WILLIAM T WALSH CLERK

) 20-5518 (KMW)  
)  
)  
)  
)*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of See Attachment A in the county of \_\_\_\_\_ in the  
District of New Jersey, the defendant(s) violated:

<i>Code Section</i>	<i>Description of Offenses</i>
18 U.S.C Section 1349	Conspiracy to committ bank fraud and wire fraud.  See Attachment A hereto.

This criminal complaint is based on these facts:

See Attachment B hereto.

Continued on the attached sheet.



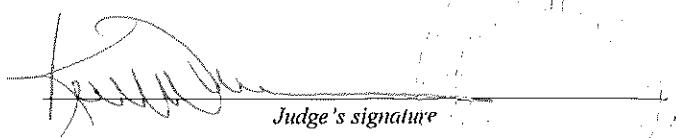
*Caitlin Plasecki*  
Complainant's signature

Caitlin Plasecki, Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/07/2020



*Karen M. Williams*  
Judge's signature

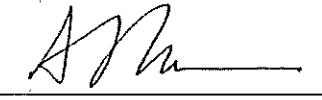
Hon. Karen M. Williams, U.S. Magistrate Judge

Printed name and title

City and state: Camden, New Jersey

## **CONTENTS APPROVED**

### **UNITED STATES ATTORNEY**

By:   
ALISA SHVER  
Assistant U.S. Attorney

Date: February 7, 2020

**Attachment A**

(Conspiracy to Commit Bank Fraud and Wire Fraud)

From on or about May 4, 2018 through in or about February, 2020, in the District of New Jersey, and elsewhere, the defendant,

**KAYLA MASSA**

did knowingly and intentionally conspire and agree with others, known and unknown, to devise a scheme and artifice to defraud financial institutions and the United States, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice: (1) to cause to be transmitted by means of wire communications in interstate and foreign commerce, certain signs, signals, and sounds, contrary to Title 18, United States Code, Section 1343; (2) to defraud a financial institution by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344, as described in Attachment B.

In violation of Title 18, United States Code Section 1349.